

1 AARON D. FORD
 2 Attorney General
 3 NICOLE N. TING (Bar No. 12289)
 4 Deputy Attorney General
 State of Nevada
 Office of the Attorney General
 100 North Carson Street
 Carson City, Nevada 89701-4717
 5 (775) 684-1213 (phone)
 (775) 684-1108 (fax)
nnting@ag.nv.gov

7 *Attorneys for the State of Nevada ex rel.
 8 the Nevada Division of Forestry,
 and Kacey KC, an individual*

9

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 LUIS SANDOVAL, an individual,

Case No. 2:25-CV-00500-MMD-NJK

13 Plaintiff,

14 vs.

15 STATE OF NEVADA *ex rel.* NEVADA
 16 DEPARTMENT OF CORRECTIONS, a State of
 Nevada agency; STATE OF NEVADA *ex rel.*
 17 THE STATE OF NEVADA, DIVISION OF
 FORESTRY, a State of Nevada agency; JEREMY
 BEAN, an individual; RONALD OLIVER, an
 individual; KACEY KC, an individual;
 18 KIMBERLY MCCOY, an individual; GILLIAN
 LAMBEY, an individual, MARK GALVEZ
 MARTINEZ, an individual; PATRICIO
 CORDERO, an individual; EDGAR
 DESANTIAGO, an individual; KENNETH
 WILLIAMS, an individual; DOE UTILIZATION
 REVIEW COMMITTEE MEMBERS, individuals;
 22 DOE CHIEF OF NURSING SERVICES, and
 individual; DOE DIRECTORS OF NURSING,
 individuals; JUSTIN MCROBERTS, an
 individual; DOE CHARGE NURSES, individuals;
 24 DOE PHARMACISTS, individuals; DOE
 PHARMACY TECHNICIANS, individuals;
 25 ELBETH ALBANA, an individual; MIRIT
 AVRAM, an individual; BETTY OMANDAC, an
 individual; SYMOUR OMANDAC, an individual;
 26 DOE PROVIDERS 1 through 11;

27

28 **ORDER GRANTING AMENDED
 STIPULATION AND ORDER TO
 EXTEND TIME TO FILE RESPONSIVE
 PLEADING FOR DEFENDANT STATE
 OF NEVADA EX REL. THE NEVADA
 DIVISION OF FORESTRY, AND KACEY
 KC
 (FIRST REQUEST)**

Defendants.

1 Plaintiff Luis Sandoval, by and through his counsel, the law firm of LAGOMARSINO LAW, and
2 Defendants State of Nevada *ex rel.*; Nevada Division of Forestry (“NDF”) and Kacey KC, by and through
3 their counsel, Attorney General for the State of Nevada AARON D. FORD, and Deputy Attorney General
4 NICOLE N. TING, hereby agree and stipulate that the time to file a responsive pleading to Plaintiff’s
5 Complaint for Defendants NDF and Kasey KC is extended until **July 3, 2025**. This is the first stipulation
6 or request for extension of this deadline.

7 **I. FACTS**

8 Plaintiff filed his Complaint on March 17, 2025, in the United States District Court for the District
9 of Nevada. The dates the Defendants were served with the Complaint and associated Summons, are noted
10 below:

- 11 A. The Defendants filed a signed and agreed to an Acceptance of Service of the Complaint
12 and Summons that was signed on May 22, 2025, and filed on May 22, 2025.

13 **II. STIPULATION TO EXTEND TIME TO FILE RESPONSIVE PLEADING**

14 The Acceptance of Service Defendants State of Nevada *ex rel.* Nevada Division of Forestry and
15 Kacey KC filed on May 22, 2025, set the deadline for a responsive pleading to be filed by Defendants
16 within 30 days of that filing. 30 days from that filing is Friday June 20, 2025.

17 Plaintiffs and Defendants hereby agree and stipulate that the time to file a responsive pleading for
18 Defendants State of Nevada *ex rel.* Nevada Division of Forestry and Kacey KC to Plaintiffs’ Complaint
19 is extended until **July 3, 2025**.

20 ////

21 ////

22 ////

23 ////

24 ////

25 ////

26 ////

27 ////

28

1 **III. REASON FOR DELAY**

2 The reason causing the need for additional time and for missing the filing deadline for filing an
 3 extension is due to excusable neglect. Counsel for NDF and Kacey KC recently had three (3) close
 4 relatives pass away causing the need to take leave from work. This has caused the need for more time in
 5 order to prepare a response to Plaintiff's Complaint.

6 **IT IS SO ORDERED:**

7 
 8

 9 UNITED STATES DISTRICT COURT JUDGE

10 DATED: June 24, 2025

11 Submitted By:

12 AARON D. FORD
 Attorney General

13 By: /s/ Nicole N. Ting
 14 NICOLE N. TING, ESQ (#12289)
 Deputy Attorney General
*Attorneys for the State of Nevada ex rel.
 the Nevada Division of Forestry, and Kacey KC, an individual*

16 DATED this 23rd day of June, 2025.

17 AARON D. FORD
 Attorney General

19 By: /s/ Nicole N. Ting
 20 NICOLE N. TING
 Deputy Attorney General
 Nevada Bar No. 12289
 Office of the Nevada Attorney General
 100 N. Carson Street
 Carson City, Nevada 89701-4717
 (775) 684-1213
nnting@ag.nv.gov
*Attorneys for the State of Nevada ex rel.
 the Nevada Division of Forestry, and
 Kacey KC, an individual*

16 DATED this 23rd day of June, 2025.

17 LAGOMARSINO LAW

19 By: /s/ Cristina P. Valentine
 20 ANDRE M. LAGOMARSINO, ESQ.
 Nevada Bar No. 6711
 CRISTINA P. VALENTINE, ESQ.
 Nevada Bar No. 16440
 3005 W. Horizon Ridge Pkwy. Ste 241
 Henderson, Nevada 89502
aml@lagomarsinolaw.com
cristina@lagomarsinolaw.com
Attorneys for Plaintiff Luis Sandoval

25 ////

26 ////

27 ////

1 DATED this 23rd day of June, 2025.

2 AARON D. FORD
3 Attorney General

4 By:/s/ Rudolf M. D'Silva
5 RANDALL GILMER
6 Chief Deputy Attorney General
7 Nevada Bar No. 14001
8 RUDOLF M. D'SILVA
9 Deputy Attorney General
Nevada Bar No. 16227
Office of the Nevada Attorney General
100 N. Carson Street,
Carson City, NV 89701-4717
(775) 684-1213
rdsilva@ag.nv.gov
11 Attorneys for NDOC Defendants

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28